

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

**DEFENDANT'S MOTION FOR THE ISSUANCE
OF ORDER RE VERIZON WIRELESS RECORD**

The defendant, Shawn Herron, in the above-entitled matter moves the Court to issue an Order to Verizon Wireless to produce the call log record of all calls made on February 11, 2020 on Verizon Wireless telephone number 774-70402787. In support of this motion, the defendant states the following:

(1) On February 11, 2020, the defendant was in possession of an Apple call phone provided to him by the United States Postal Service to be used for work purpose and which was assigned number 774-704-2878. Cell service to that number was provided by Verizon Wireless.

(2) The defendant is in need of the phone log of calls he placed from the said number on February 11, 2020 to document that prior to being questioned by Post Office Inspectors on that date, he utilized that cell telephone to call his union representative in order to obtain an attorney prior to being questioned by the post inspectors; that he was not able to reach his union representative and that shortly after he placed the call, the union representative returned his call which was not answered.

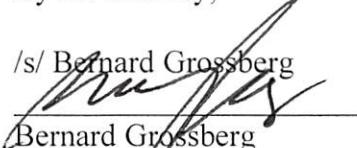
(3) The defendant has not been able to obtain the requested call log records as the account for the number assigned to his work cell phone was issued to the United States Postal Service and is not in his name.

(4) Upon his arrest on February 11, 2020, the said cell phone was seized by Post Office Inspectors. Subsequently, by use of a cellebeits program the text message contents of the cell phone were downloaded, however, neither individual telephone calls, nor a call log could be downloaded without the pass code to that cell phone.

(5) The defendant advised the government that he does not recall the pass code to his work cell phone and inquired as to how many digits were required by the pass code in an effort to refresh his memory of the pass code. The government informed the defendant that the cell phone requires a 10 digit pass code with one special character and one number. This information has not served to refresh the defendant's memory of the pass code to his work cell phone.

(6) The defendant has no other means to obtain the cell phone call log to his work cell phone number other than by a Court order issued to Verizon Wireless.

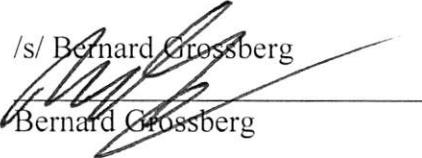
Respectfully submitted
By his attorney,

/s/ 
Bernard Grossberg

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CERTIFICATE OF SERVICE

I, Bernard Grossberg, hereby certify that on June 29, 2021, I served a true copy of the **Defendant's Motion For The Issuance Of Order Re Verizon Wireless Records** upon Assistant United States Attorney, Eugenia Carris, Office of the United States Attorney, 1 Courthouse Way, Boston, MA 02210 by hand delivering same.

/s/ 
Bernard Grossberg